

**BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001**

---

**RATE AND SERVICE CHANGES TO  
IMPLEMENT FUNCTIONALLY EQUIVALENT  
NEGOTIATED SERVICE AGREEMENT WITH  
THE BRADFORD GROUP**

---

**DOCKET NO. MC2007-4**

**JOINT MOTION OF THE BRADFORD GROUP AND UNITED STATES  
POSTAL SERVICE FOR PROTECTIVE CONDITIONS IN RESPONSE TO  
COMMISSION ORDER NO. 38  
(OCA/USPS-T1-19(c), 20, 21(c), 21(f), 21(i), and 22)**

The Bradford Group and the Postal Service submit this joint motion to renew their request that the Commission establish protective conditions regarding the Postal Service's response to OCA/USPS-T1-19(c), 20, 21(c), 21(f), 21(i), and 22 and permit the Postal Service to file its response to this interrogatory under seal. In Commission Order No. 38, issued October 9, 2007, the Commission denied the parties' initial request for protective conditions regarding these responses while preserving the parties' right to renew their request. Because the information contained in the workpaper sought by these interrogatories contains information that, together with publicly available information and other information filed publicly in this docket, could be used by Bradford's competitors to gain an unwarranted competitive advantage over Bradford, Bradford and the Postal Service hereby renew their joint request for protective conditions.

To support this request, the parties have attached an affidavit from Bradford Group witness Steve Gustafson which explains how The Bradford Group would be

competitively harmed by the public submission of this response. As indicated by witness Gustafson, the workpaper in question provides a level of detail about Bradford's mailing practices that is far beyond what Bradford would generally reveal publicly. Just as Bradford does not have access to this sort of information about its competitors, Bradford's competitors should not have access to such information about Bradford. Additionally, the information contained in this workpaper is similar to the information contained in Postal Service mailing statements (Form 3602), which the Postal Service has long held to be commercially sensitive and protected from disclosure under the Freedom of Information Act.

Bradford and the Postal Service understand that the Commission and the Office of the Consumer Advocate may find the workpaper in question useful in verifying information submitted in support of the Negotiated Service Agreement. The parties therefore have no objection to filing this workpaper under seal. Publicly filing this workpaper, however, simply creates too great a risk of competitive harm to Bradford. Accordingly, the parties renew their request that the Commission establish protective conditions governing this response.

Respectfully submitted,

THE BRADFORD GROUP

By its attorneys:

Ian D. Volner  
Rita L. Brickman  
Matthew D. Field  
Venable LLP  
575 7<sup>th</sup> Street, NW  
Washington, DC 20004-1601

(202) 344-4814  
[idvolner@venable.com](mailto:idvolner@venable.com)

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

Elizabeth A. Reed  
475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-3179, Fax -6187

DC2/903080v1